

EXHIBIT 196

From: Jack Crowley
To: Dempsey, Michele [GPSUS]
Sent: 7/26/2013 7:04:29 PM
Subject: FW: Introductory Call
Attachments: Janssen Abuse and Diversion Detection etc.docx

Hello Michele:

This is what I sent to Ron just to get it going. I should have sent it to you first - sorry.

Have a great weekend.

Best regards,

Jack

From: Jack Crowley [mailto:crowleyassoc@att.net]
Sent: Tuesday, July 23, 2013 3:27 PM
To: 'Kuntz, Ron [OMP]'
Subject: RE: Introductory Call

Hello Ron:

Here are some preliminary rough notes on the subject of our recent conversation - DEA impact on Pharmacy stocking C-II medications - developing a system for your Abuse and Diversion Detection Program - Prescribers of Concern. Of course you could entitle or label this program any way you want.

We discussed training for the sales force, how to recognize what is suspicious or a cause for concern, that this is a delicate balance - and generally what steps need to be taken to bring information into the home office, so to speak, how to handle that information and how to move forward.

This is really a white board type exercise, suitable for your small, dedicated sales team (contract sales organization) working with about 10,000 HCP's in the pain management space.

- I. Establish a Standard Operating Procedure and Training Program for the Analgesic Team; Make this a requirement - initial training and annual update.
- II. SOP considerations and broad sample:
- III. Establish a Standard Operating Procedure or Standard Business Practice for Handling and Conducting Internal Inquiries.
- IV. Maintain the "Cease Calling" List - and Patient Assistance Discontinuance notifications, etc.
- V. Determine whether or not there is any synergy between what was learned during the internal inquiry and any retail pharmacies serviced by Janssen authorized distributors.

"Know your customers' customers" - Janssen Suspicious or Noteworthy Order Monitoring System and collaboration/mutual support with authorized distributors.

I hope this humble effort helps you to get headed in the right direction. Please let me know if I can be of any assistance in this matter.

It is in a format suitable for cut and paste.

Best regards,

Jack

From: Kuntz, Ron [OMP] [<mailto:RKuntz@its.inj.com>]
Sent: Tuesday, July 9, 2013 11:55 AM
To: crowleyassoc@att.net
Subject: Introductory Call

Hi Jack,

Michele Dempsey spoke very highly of you and passed on your name and contact information to me. I would like to ask if you are available this Friday to talk on the phone. I'm free all day Friday, except from 1 pm – 3 pm.

Thanks, Ron

Ron Kuntz
Product Director
Pain Franchise
CNS



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